

**Before the
Federal Communications Commission
Washington, DC**

In the Matter of)	
)	
Request for Review of the Decision of)	
the Universal Service Administrator)	CC Docket No. 02-6
and Addendum by)	
)	
Orange County School District)	File No. SLD-901556
Orlando, Florida)	
)	
Schools and Libraries Universal Service)	
Support Mechanism)	

REQUEST FOR REVIEW AND WAIVER

INTRODUCTION

Orange County Public Schools (OCPS), by its representative, hereby requests that the Commission review the Decision of the Administrator (USAC) in the above captioned matter. OCPS respectfully requests a waiver of the current action taken by USAC regarding the denial to adjust a service start date for FRN 2540985.

BACKGROUND

On November 27, 2013, OCPS received a Funding Commitment Decision Letter approving funding for six Priority One FY2013 FRNs, all located on Application No. 901556. According to program rules, OCPS had 120 days from the date of the FCDL to file their Form 486. OCPS did timely file a Form 486, but mistakenly left off one FRN. The FRN inadvertently left off the Form 486 was for analog telephone services being delivered to OCPS. Once the District learned of the clerical error, a Form 486 was electronically filed on October 23, 2014, and requested a service start date of 7/1/2013. As a result of the timing of the Form 486, the service start date for the FRN at issue was adjusted to 6/25/2014. In addition to adjusting the service start date, the committed funds for this FRN were reduced by \$477,708.00 to reflect a committed amount of only \$43,428.00.

As the invoice deadline for this FRN approached, the District prepared and filed a BEAR for analog phone services covered under FRN 2540985 between November 2013 and June 2014. The BEAR was applicant identified as OC13-47205-BHNAAnalog and SLD Invoice ID of 2194222. The BEAR was filed requesting \$192,099.60 in reimbursements and approved by the SLD for a payment of only \$24,012.45. The reason provided for not paying the BEAR as filed was “Billed Date Before 486 Service-Start Date”.

OCPS appealed the denial of the BEAR to the SLD and requested that the service start date for the FRN at issue be adjusted back to 7/1/2013, the funding be reinstated, and OCPS be allowed to file another BEAR for the remaining portion of the 2013 Funding Year.¹ On November 30, 2015, OCPS received the attached denial of the USAC appeal.² At this time, OCPS is appealing this matter to the FCC and requesting a waiver of the 486 deadline that caused the service start date adjustment.

DISCUSSION

The Commission may waive any provision of its rules on its own motion and for good cause shown.³ A rule may be waived where the particular facts make strict compliance inconsistent with the public interest.⁴ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁵ In sum, waiver is appropriate if special circumstances warrant a deviation from the general rule, and such deviation would better serve the public interest than strict adherence to the general rule.⁶ The SLD requirement that an applicant certify CIPA does not apply to a telecommunications request goes above and

¹ A copy of the appeal filed with USAC is attached as Exhibit A.

² USAC Decision on Appeal is attached as Exhibit B.

³ 447 C.F.R. §1.3.

⁴ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (Northeast Cellular).

⁵ *WAIT Radio v. FCC*, 418 F.2d 1153, 1157, (D.C. Cir. 1969), affirmed by *WAIT Radio v. FCC*, 459 F.2d 1203 (D.C. Cir. 1972).

⁶ *Northeast Cellular*, 897 F.2d at 1166.

beyond what is required by CIPA. Since certification of a telecommunications request is not required by CIPA, it is a requirement which can be waived by the FCC.

In 2008 the Commission released the *Alcona County Library Order*, granting 34 appeals of decision by the Universal Service Administrative Company (USAC). Again, in 2010 the Commission granted 25 appeals of decisions by USAC in the *Children of Peace Order*. Both cases are in keeping with the established precedent set by the *Alaska Gateway Order*, in which the Commission stated that the Form 486 120 day deadline can be waived for internet access and telecommunications requests. Additionally, by missing the Form 486 deadline for an application only containing telecommunications requests, OCPS missed a USAC procedural deadline and did not violate a Commission rule. OCPS is solely appealing a telecommunication request.

OCPS requests a waiver of the 486 deadline for the Telecommunication funding request the SLD adjusted and then denied payment on due to the fact CIPA does not apply to telecommunications funding requests. CIPA specifically states:

(ii) Applicability The prohibition in clause (i) shall not apply with respect to a school that receives services at discount rates under paragraph (1) (B) only for purposes other than the provision of Internet access, Internet services, or internal connections.⁷

SUMMARY

OCPS respectfully requests the Commission to waive the Form 486 120 day deadline for the 2013 Funding Requests FRN 2540985. In addition, the District respectfully requests that the funding reduction to the FRN at issue be reinstated.

Respectfully submitted



Lisa Connelly, Sen. Admin. E-Rate Compliance
Orange County School District
445 W. Amelia Street
Orlando, FL 32801
lisa.connelly@ocps.net

⁷ See 47 U.S.C. § 254 (h)(5)(A)(ii).

Exhibit A

August 14, 2015

via e-mail: appeals@sl.universalservice.org

Letter of Appeal Schools and Libraries Division – Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

APPEAL OF REDUCTION TO BEAR REIMBURSEMENT REQUEST

Applicant:	Orange County School District
Billed Entity Number:	127681
Form 471 Application No.:	901556
Funding Year:	2013
FRN Number:	2540985
USAC Decision Date:	July 31, 2015

The undersigned, on behalf of Orange County School District (OCPS) requests that USAC reconsider the decision to deny payment on the Form 472 BEAR filed by OCPS for the above referenced telecommunications FRN. The decision to deny the payment due to the billing date being before the approved Form 486 Service Start Date should be corrected and the submitted invoices paid.¹

BACKGROUND

On November 27, 2013, OCPS received a Funding Commitment Decision Letter approving funding for six FY2013 FRNs, all located on Application No. 901556. According to program rules, OCPS had 120 days from the date of the FCDL to file their Form 486. OCPS did timely file a Form 486, but mistakenly left off one FRN. The FRN inadvertently left off the Form 486 was for analog telephone services being delivered to OCPS. Once the District learned of the clerical error, a Form 486 was electronically filed on October 23, 2014, and requested a service start date of 7/1/2013.² As a result of the timing of the Form 486, the service start date for the FRN at issue was adjusted to 6/25/2014. In addition to adjusting the service start date, the committed funds for this FRN were reduced by \$477,708.00 to reflect a committed amount of only \$43,428.00.

¹ A copy of the BEAR Notification Letter dated July 31, 2015 is attached as Exhibit A.

² A copy of the Form 486 is attached as Exhibit B.

As the invoice deadline for this FRN approached, the District prepared and filed a BEAR for analog phone services covered under FRN 2540985 between November 2013 and June 2014.³ The BEAR was applicant identified as OC13-47205-BHNAAnalog and SLD Invoice ID of 2194222. The BEAR was filed requesting \$192,099.60 in reimbursements and approved by the SLD for a payment of only \$24,012.45. The reason provided for not paying the BEAR as filed was “Billed Date Before 486 Service-Start Date”.

DISCUSSION

The FCC has consistently held that the 120 day Form 486 deadline is a procedural deadline and missing the deadline is not a violation of a Commission rule.⁴ As such, OCPS respectfully requests that the service start date for FRN 2540985 be set back to July 1, 2013, as requested on the Form 486 and that the funding commitment amount be increased back to \$521,136.00. With the adjustment to the service start date and funding commitment amount, OCPS requests that either the BEAR be paid as originally filed, or the invoice deadline be extended in order to allow the District to file a BEAR for the line items not paid.

Respectfully submitted
on behalf of Orange County School District



Lisa Connelly
Sen. Admin. E-Rate Compliance
445 W. Amelia Street
Orlando, FL 32801
lisa.connelly@ocps.net

³ A copy of the BEAR is attached as Exhibit C.

⁴ See *Request for Review of the Decision of the Universal Service Administrator by Alaska Gateway School District, Tok, AK, et al., Schools and Libraries Universal Service Support Mechanism*, File Nos. SLD-412028, *et al.*, CC Docket No. 02-6, Order, 21 FCC Rcd 10182 (Wireline Comp. Bur. 2006) (*Alaska Gateway School District*) and *Review of the Decision of the Universal Service Administrator by Alcona County Library, Harrisville, MI, et al., Schools and Libraries Universal Service Support Mechanism*, File Nos. SLD-425479, *et al.*, CC Docket No. 02-6, Order, DA 08-2379 (Wireline Comp. Bur. 2008).

Exhibit A



Universal Service Administrative Company

Schools and Libraries Division



Form 472 (BEAR) Notification Letter

July 31, 2015

Candida Foster
Bright House Networks, LLC
700 Carillon Pkwy
Suite 5
Saint Petersburg, FL 33716

Re: Invoice Number - as assigned by USAC: 2194222
Service Provider Identification Number: 143016611
Reimbursement Form Number: OC13-47205-BHNAalog
Billed Entity Number: 127681

Lisa Connelly
ORANGE COUNTY SCHOOL DISTRICT
445 W AMELIA ST
ORLANDO, FL 32801

Preferred Mode of Contact: E-mail at lisa.connelly@ocps.net
Total Amount of Reimbursement Approved for Payment: \$24012.45

This letter is your notification that the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has processed an FCC Form 472, "Billed Entity Applicant Reimbursement (BEAR)" Form from the above named applicant listing you as the service provider. USAC has committed to reimburse the discounted portion of the cost of eligible services provided to eligible entities pursuant to one or more FCC Forms 471, "Description of Services Ordered and Certification Form".

In certain instances, a line may not have been paid. Review the BEAR Letter Applicant Reimbursement Report (Report) following this letter for the reason(s) this may have occurred. For more information about lines that have not been paid, see the explanation of Invoice Error Codes in Step 9 on our website. Work with the applicant (your customer) to correct any errors. Once corrected, your customer may submit a new BEAR to request reimbursement for any unpaid lines.

We recommend using the BEAR Online tool from the Apply Online area or Required Forms section of our website for additional submissions. If a new BEAR cannot be submitted before the invoice deadline passes, you or your customer may submit a request for a deadline extension. (See "Invoice Deadlines and Extension Requests" posted in the SLD section of our website for more information.)

Pursuant to the Federal Communication Commission's (FCC) Second Report and Order and Further Notice of Proposed Rulemaking (FCC 03-101, released April 29, 2003), you must remit the amount shown as "Total Amount of Reimbursement Approved for Payment" above to your customer no later than 20 days after receipt of payment of the approved discounts from USAC. You also agreed not to tender or make use of the payment of the approved discounts issued by USAC to you prior to remitting the discount to your customer (See BEAR Form, Block 4, Service Provider Acknowledgment).

The USAC check should be mailed to the service provider named above within 20 days of the date of this letter.

The maximum remaining amount available for each Funding Request Number (FRN) listed on the Report will be the original commitment less the amount approved herein for reimbursement and less any earlier disbursements to your customer.

PLEASE NOTE: The type of invoice form (BEAR or SPI) for the funding year is established by the receipt and approval of the first invoice submitted for the FRN for the funding year. For example, if we successfully process a BEAR for an FRN, we will not approve a SPI for that same FRN at a later time.

Please see the Guide to Letter Reports posted on our website for an explanation of the items listed in the attached Report.

COMPLETE PROGRAM INFORMATION is posted on our website. You may also contact our Client Service Bureau using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736 or toll-free by phone at 1-888-203-8100.

Schools and Libraries Division
Universal Service Administrative Company

CC: ORANGE COUNTY SCHOOL DISTRICT

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT



Form 471 Application Number: 901556
Funding Request Number: 2540985
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: 1208180
Funding Commitment Decision: \$43428.00
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
Billed Date Before 486 Service-Start Date;

Form 471 Application Number: 901556
Funding Request Number: 2540985
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: 1208180
Funding Commitment Decision: \$43428.00
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
Billed Date Before 486 Service-Start Date;

Form 471 Application Number: 901556
Funding Request Number: 2540985
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: 1208180
Funding Commitment Decision: \$43428.00
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
Billed Date Before 486 Service-Start Date;

Form 471 Application Number: 901556
Funding Request Number: 2540985
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: 1208180
Funding Commitment Decision: \$43428.00
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
Billed Date Before 486 Service-Start Date;

Form 471 Application Number: 901556
Funding Request Number: 2540985
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: 1208180
Funding Commitment Decision: \$43428.00
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
Billed Date Before 486 Service-Start Date;

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT

Form 471 Application Number: 901556
Funding Request Number: 2540985
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: 1208180
Funding Commitment Decision: \$43428.00
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
Billed Date Before 486 Service-Start Date;

Form 471 Application Number: 901556
Funding Request Number: 2540985
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: 1208180
Funding Commitment Decision: \$43428.00
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
Ship Date Before 486 Service-Start Date;

Form 471 Application Number: 901556
Funding Request Number: 2540985
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: 1208180
Funding Commitment Decision: \$43428.00
Reimbursement Amount for this FRN: \$24012.45

Exhibit B

FCC Form 486 DO NOT STAPLE	Do Not Write in this Area	Approval by OMB 3060-0853 Estimated time per response: 1.5 hours
Schools and Libraries Universal Service		
Receipt of Service Confirmation and Children's Internet Protection Act and Technology Plan Certification Form		
To be completed by the Billed Entity Please read instructions before completing.		
		(You can also file
Applicant's Form Identifier FY13Tel486 (Create your own code to identify THIS FCC Form	FCC Form 486 Application# 0nl1049441 (To be assigned by administrator)	
Block 1: Billed Entity Information		
1. Name of Billed Entity ORANGE COUNTY SCHOOL DISTRICT		
2. Billed Entity Number 127681	3. Funding Year July 1, 2013 through June 30, 2014	
4. Complete Mailing Address of Billed Entity Street Address, P.O. Box, or Route Number 445 W AMELIA ST		
City State Zip Code ORLANDO FL 32801 -		
Telephone Number 407-317-3200 Extension	Fax Number 407-317-3222	
5. Contact Person Information Contact Person Name Lisa Connelly		
Street Address, P.O. Box or Route Number 445 W AMELIA ST		
City State Zip Code ORLANDO FL 32801 -		
Check the box next to the preferred mode of contact. (At least one box MUST be checked.)		
<input type="checkbox"/> Telephone Number Extension Fax Number 407-317-3200 407-317-3222		
<input checked="" type="checkbox"/> Email Address lisa.connelly@ocps.net		

Entity Number	127681	Applicant's Form Identifier	FY13Tel486
Contact Person	Lisa Connelly	Phone Number	407-317-3200
Block 2: Early Filing Information and CIPA Waiver Requests			
6a. Early Filing			
<p>CHECK THE BOX BELOW IF THE FRNS ON THIS FCC FORM 486 ARE FOR SERVICES STARTING ON OR BEFORE JULY 31 OF THE FUNDING YEAR.</p> <p><input type="checkbox"/> The Funding Requests listed in Block 3 have been approved by USAC as shown in my Funding Commitment Decision Letter (FCDL). I have confirmed with the service provider(s) featured in those Funding Requests that these services will start on or before July 31 of the Funding Year.</p> <p>Remember: Early filing using Item 6a is an option if and ONLY if services will start within the month of July of the relevant Funding Year, all relevant certifications in Block 4 can be accurately made, and the FCC Form 486 is postmarked on or before July 31 of the Funding Year.</p>			
6b. CIPA Waiver			
<p>CHECK THE BOX BELOW IF YOU ARE REQUESTING A WAIVER OF CIPA REQUIREMENTS FOR THE SECOND FUNDING YEAR IN WHICH YOU HAVE APPLIED FOR DISCOUNTS IF YOU AS THE BILLED ENTITY ARE THE ADMINISTRATIVE AUTHORITY.</p> <p><input type="checkbox"/> I am providing notification that, as of the date of the start of discounted services, I am unable to make the certifications required by the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), because my state or local procurement rules or regulations or competitive bidding requirements prevent the making of the certification(s) otherwise required. I certify that the schools or libraries represented in the Funding Request Number(s) on this FCC Form 486 will be brought into compliance with the CIPA requirements before the start of the Third Funding Year in which they apply for discounts.</p> <p>(For Libraries for Funding Year 2004: You may also request this waiver for FY2004 if you as the Billed Entity are the Administrative Authority for the library(ies) represented on this FCC Form 486. By checking this box, you are certifying that the libraries represented in the Funding Request Number(s) on this FCC Form 486 will be brought into compliance with the CIPA requirements before the start of Funding Year 2005.)</p>			

Contact Person	Lisa Connelly	Phone Number	407-317-3200
Block 3: Service Information			
7. Please provide the following information for each FCC Form 471 Block 5 (Discount Funding Request) item for which the Billed Entity is indicating that the named service provider may begin submitting invoices to USAC. You will need your FCDL for some of the information required below. Remember: The FRNs listed below must be from the same Funding Year as is listed in Block 1, Item 3. If you need additional pages, please label them 3A, 3B, 3C, etc. and indicate the number in the space provided here:			

Page 3

(A) FCC Form 471 Application Number From FCDL	(B) Funding Request Number (FRN) From FCDL	(C) Service Provider Identification Number (SPIN) From FCDL	(D) Service Provider Name From FCDL	(E) Funding Year Service Start Date (Earliest Date that Discounted Services Will Begin)
901556	2540985	143016611	Bright House Networks, LLC	7/1/2013



8. ☒ I certify that, if required by program rules, the entity(ies) receiving discounted services as indicated on this FCC Form 486 are covered by technology plan(s), that have been approved by a state or other authorized body (i.e., a USAC-certified

Block 4:Certifications and Signature

technology plan approver) prior to the commencement of service and that cover all 12 months of the funding year. Provide the name(s) of the organization(s) that approved a technology plan for any eligible entity that is receiving services covered under this FCC Form 486 or, if EVERY FRN listed in this FCC Form 486 is for services that do not require a technology plan, enter "NONE" here.

Florida Department of Education

9. ☒ I certify that the services listed on this FCC Form 486 have been, are planned to be, or are being provided to all or some of the eligible entities identified in the FCC Form 471 application(s) cited above. I certify that there are signed contracts covering all of the services listed on this FCC Form 486 except for those services provided under tariff or on a month-to-month basis. I certify that I am authorized to submit this receipt of service confirmation on behalf of the above-named Billed Entity; that I have examined this request; and that, to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

10. ☒ I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the services receive an appropriate share of benefits from those services. I recognize that I may be audited pursuant to this application and will retain for five years (or whatever retention period is required by the rules in effect at the time of your certification) any and all records, including FCC Forms 479 where required, that I rely upon to complete this form and, if audited, will make available to the Administrator such records.

NOTES FOR COMPLETING THE CERTIFICATIONS IN ITEM 11: A Billed Entity who is the Administrative Authority must check Item 11a or 11b or 11c. Check only ONE item. If the Billed Entity is not the Administrative Authority, skip to Item 11d. A Billed Entity who represents one or more Administrative Authorities must check Item 11d or 11e. A Billed Entity who represents one or more Administrative Authorities in Funding Years after Funding Year 2001 and who checks Item 11d must check Item 11f or 11g. See the FCC Form 486 Instructions for Item 11, "Special Notes for Billed Entities Who Represent One or More Administrative Authorities."

IF THIS FORM PERTAINS TO A FUNDING YEAR PRIOR TO FUNDING YEAR 2001 (THE FUNDING YEAR BEGINNING JULY 1, 2001), SKIP TO ITEM 12.

I certify that as of the date of the start of discounted services:

a. ☒ the recipient(s) of service represented in the Funding Request Number(s) on this FCC Form 486 has (have) complied with the requirements of the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l).

b. ☐ pursuant to the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), the recipient(s) of service represented in the Funding Request Number(s) on this FCC Form 486:

(FOR SCHOOLS and FOR LIBRARIES IN THE FIRST FUNDING YEAR FOR PURPOSES OF CIPA) is (are) undertaking such actions, including any necessary procurement procedures, to comply with the requirements of CIPA for the next funding year, but has (have) not completed all requirements of CIPA for this funding year.

(FOR FUNDING YEAR 2003 ONLY: FOR LIBRARIES IN THE SECOND OR THIRD FUNDING YEAR FOR PURPOSES OF CIPA) is (are) in compliance with the requirements of CIPA under 47 U.S.C. § 254(l) and undertaking such actions, including any necessary procurement procedures, to comply with the requirements of CIPA under 47 U.S.C. § 254(h) for the next funding year.

c. ☐ the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), does not apply because the recipient(s) of service represented in the Funding Request Number(s) on this FCC Form 486 is (are) receiving discount services only for telecommunications services.

FOR A BILLED ENTITY WHO REPRESENTS ONE OR MORE ADMINISTRATIVE AUTHORITIES:

d. ☐ I certify as the Billed Entity for the consortium that I have collected duly completed and signed FCC Forms 479 from all eligible members of the consortium.

e. ☐ I certify as the Billed Entity for the consortium that the only services that have been approved for discounts under the universal service support mechanism on behalf of eligible members of the consortium are telecommunications services, and therefore the requirements of the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), do not apply.

For Funding Years after Funding Year 2001: If you checked Item 11d above, check ONE of the boxes below:

f. ☐ I certify that some or all of the eligible consortium members checked FCC Form 479 Item 6d to seek a CIPA Waiver, and upon request from the Administrator I can provide this information; OR

g. ☐ I certify that no eligible consortium members checked FCC Form 479 Item 6d to seek a CIPA Waiver.

The certification language above is not intended to fully set forth or explain all the requirements of the statute.



Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

12. Signature of authorized person

13. Date

10/23/2014 8:28:11 AM

14. Printed name of authorized person

Lisa Connelly

15. Title or position of authorized person

Senior Admin. E-Rate Compliance

16a. Street Address, P.O. Box, or Route Number

445 W Amelia St

City

Orlando

State FL

Zip Code 32801 -

16b. Telephone number of authorized person

Extension

16c. Fax number of authorized person

407-317-3200

2002229

407-317-3994

16d. Email address of authorized person

Lisa.Connelly@ocps.net

16e. Name of authorized person's employer

Orange County Public Schools

DO NOT STAPLE

OMB Control No. 3060-0853

Entity Number 127681

Applicant's Form Identifier FY13Tel486

Contact Person Lisa Connelly

Phone Number 407-317-3200

FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 54 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to range from 1 to 1.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERF, Paperwork Reduction Act Project (3060-0853), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0853.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Please submit this form to:

**SLD Form 486
PO Box 7026
Lawrence, KS 66044-7026**

For express delivery services or U.S. Postal Service, Return Receipt Requested, send this form to:

**SLD Forms
ATTN: SLD Form 486
3833 Greenway Dr
Lawrence, KS 66046
888-203-8100**

Exhibit C

DO NOT STAPLE THIS FORM

Do not write in this space.

Universal Service for Schools and LibrariesPlease read instructions before
completing.(To be completed by schools, libraries, or
consortia.)**BILLED ENTITY APPLICANT REIMBURSEMENT FORM****For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.****Only one Service Provider Identification Number (SPIN) per form.****Must be completed and signed by the Billed Entity Applicant and signed by the relevant service provider.****Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.****FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT**

Part 54 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to range from 1 to 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Act Project (3060-0856), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0856.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Applicant Form Identifier (Create an identifier for your own reference) OC13-47205-BHNAalog	FCC Form 472 Invoice # (To be inserted by administrator) 2194222
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BLOCK 1: HEADER INFORMATION

1. Billed Entity Name	ORANGE COUNTY SCHOOL DISTRICT
2. Billed Entity Number	127681
3. Service Provider Identification Number (SPIN)	143016611
4. Contact Name	Lisa Connelly
5. Contact Telephone Number	407- 3173200 ext
6. Total Reimbursement Amount (total from Block 2, Column 14)	\$192,099.60

Billed Entity Applicant Reimbursement Form

For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.

Billed Entity Name ORANGE COUNTY SCHOOL DISTRICT Billed Entity Number 127681
 Contact Name Lisa Connelly Contact Telephone Number 407-3173200
 Applicant Form Identifier OC13-47205-BHNAalog

BLOCK 2: LINE ITEM INFORMATION PER FUNDING REQUEST NUMBER

	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
	FCC Form 471 Application Number (from Funding Commitment Decision Letter)	Funding Request Number (FRN) (from Funding Commitment Decision Letter)	Bill Frequency	Customer Billed Date (mm/yyyy)	Shipping Date to Customer or Last Day of Work Performed (mm/dd/yyyy)	Total (Undiscounted) Amount for Service	Discount Rate	Amount Billed to USAC (Column 12 multiplied by Column 13)
			DO NOT WRITE IN THIS COLUMN.	For each FRN, complete either Column (10) or Column (11), but not both Columns				
1	901556	2540985		12/1/2013		\$31,185.00	77.00	\$24,012.45
2	901556	2540985		3/1/2014		\$31,185.00	77.00	\$24,012.45
3	901556	2540985		6/1/2014		\$31,185.00	77.00	\$24,012.45
4	901556	2540985		5/1/2014		\$31,185.00	77.00	\$24,012.45
5	901556	2540985		1/1/2014		\$31,185.00	77.00	\$24,012.45
6	901556	2540985		2/1/2014		\$31,185.00	77.00	\$24,012.45
7	901556	2540985		11/1/2013		\$31,185.00	77.00	\$24,012.45
8	901556	2540985		4/1/2014		\$31,185.00	77.00	\$24,012.45
9								
10								
11								
12								
13								
14								
TOTAL REIMBURSEMENT AMOUNT TO BE ENTERED INTO ITEM (6)								\$192,099.60

BILLED ENTITY APPLICANT Reimbursement Form

Billed Entity Name ORANGE COUNTY SCHOOL DISTRICT

Billed Entity Number 127681

Contact Name Lisa Connelly

Applicant Form Identifier OC13-47205-BHNAalog

Block 3: Billed Entity Certification

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Billed Entity Applicant Reimbursement Form on behalf of the eligible schools, libraries, or consortia of those entities represented on this Form, and I certify to the best of my knowledge, information and belief, as follows:

- A. The discount amounts listed in Column (14) of this Billed Entity Applicant Reimbursement Form represent charges for eligible services delivered to and used by eligible schools, libraries, or consortia of those entities for educational purposes, on or after the service start date reported on the associated Form 486.
- B. The discount amounts listed in Column (14) of this Billed Entity Applicant Reimbursement Form were already billed by the service provider and paid by the Billed Entity Applicant on behalf of eligible schools, libraries, and consortia of those entities.
- C. The discount amounts listed in Column (14) of this Billed Entity Applicant Reimbursement Form are for eligible services approved by the fund administrator pursuant to a Form 471 Funding Commitment Decision Letter.
- D. I recognize that I may be audited pursuant to this application and will retain for five years any and all records that I rely upon to fill in this form.
- E. I certify that, in addition to the foregoing, this Billed Entity Applicant is in compliance with the rules and orders governing the schools and libraries universal service support program, and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

15. Signature of authorized person **Signed electronically by LISA E. CONNELLY**

16. Date **6/15/2015**

17. Printed name of authorized person **LISA E. CONNELLY**

18. Title or position of authorized person **Sen. Admin. E-Rate Compliance**

19. Telephone number of authorized person **407- 3173200**

20. Address of authorized person **445 W. Amelia Street, Orlando FL 32801**

BILLED ENTITY APPLICANT Reimbursement Form

Billed Entity Name ORANGE COUNTY SCHOOL DISTRICT

Billed Entity Number 127681

Contact Name Lisa Connelly

Applicant Form Identifier OC13-47205-BHNAalog

Block 4: Service Provider Acknowledgment

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Service Provider Acknowledgment for this Billed Entity Applicant Reimbursement Form, and acknowledge to the best of my knowledge, information and belief, as follows:

- A. The service provider must remit the discount amount authorized by the fund administrator to the Billed Entity Applicant who prepared and submitted this Billed Entity Applicant Reimbursement Form as soon as possible after the fund administrator's notification to the service provider of the amount of the approved discounts on this Billed Entity Applicant Reimbursement Form, but in no event later than 20 business days after receipt of the reimbursement payment from the fund administrator, subject to the restriction set forth in B. below.
- B. The service provider must remit payment of the approved discount amount to the Billed Entity Applicant prior to tendering or making use of the payment issued by the Universal Service Administrative Company to the service provider of the approved discounts for the Billed Entity Applicant Reimbursement Form.
- C. I certify that, in addition to the foregoing, this Service Provider is in compliance with the rules and orders governing the schools and libraries universal service support program, and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

21. Signature of authorized person (fax, copy or original signature) **Signed electronically by Matthew Pickens** 22. Date **6/15/2015**

23. Printed name of authorized person **Matthew Pickens**

24. Title or position of authorized person **E-Rate Specialist**

25. Telephone number of authorized person - **ext**

26. Address of authorized person **4145 S Falkenburg Rd, Riverview FL 33578**

27. Applicant Remittance Information

Name **Lou Murray**

Title **Bookkeeper**

Street Address

445 W. Amelia St

Orlando, FL 32801

A paper copy of this Form (pages 1-4) should be mailed to:

**SLD BEAR FCC Form 472
P.O. Box 7026
Lawrence, KS 66044-7026**

If sent by express delivery services or U.S. Postal Service, Return Receipt Requested, the form (pages 1-4) should be mailed to:

**SLD Forms
ATTN: SLD BEAR FCC Form 472
3833 Greenway Drive
Lawrence, KS 66046
Phone: 1-888-203-8100**

Exhibit B



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2013-2014

November 30, 2015

Lisa Connelly
OCPS
445 W Amelia St
Orlando, FL 32801

Re: Applicant Name: ORANGE COUNTY SCHOOL DISTRICT
Billed Entity Number: 127681
Form 471 Application Number: 901556
Funding Request Number(s): 2540985
Your Correspondence Dated: August 14, 2015

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2013 FCC Form 472 (BEAR) Notification Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2540985
Decision on Appeal: **Denied**
Explanation:

- For the above listed FRN, your service start date was reset to June 25, 2014 due to a late filing of the FCC Form 486. Therefore, the period for which discounts currently apply is June 25, 2014 to June 30, 2014.

Information provided indicated that services were delivered outside of this period. You did not demonstrate otherwise in your appeal. Consequently, USAC denies your appeal because these services were not delivered within the service delivery period under program rules.

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You

should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company